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April 4, 2023

ELECTRONICALLY FILED

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 705
New York, NY 10007

Re: *United States v. Cicero Williams, 22Cr. 571 (LGS)*

Dear Judge Schofield:

We represent the defendant, Cicero Williams, in the above-captioned matter, having been appointed by the Court, pursuant to the Criminal Justice Act, on March 13, 2023. We respectfully submit this joint status letter, with the consent of the Government, pursuant to the Court's order of March 13, 2023.

Since our appointment to represent Mr. Williams, we have analyzed the discovery and the *Pimentel* letter provided by the Government, and have met with Mr. Williams multiple times to discuss the case. Based on that work, and our discussions with the Government, the parties believe it is unlikely we will be able to reach a resolution short of trial, and that this case will likely proceed to trial.

The Court's current scheduling order provides for trial to begin on May 15, 2023, at 9:45 AM. Because of our recent appointment to this case, and based on our discussions with Mr. Williams, however, we believe that we will need additional time to prepare an adequate defense. Accordingly, we respectfully request that the Court adjourn the trial date for a period of approximately sixty days from May 15, 2023, to until or after July 14, 2023. This is the defense's first request for adjournment of the trial date, and the government consents to this request. If the Court grants the adjournment, we also

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respectfully request that the Court amend the current scheduling order for pretrial filings (ECF No. 26) and enter new deadlines consistent with the trial date.

Respectfully submitted,

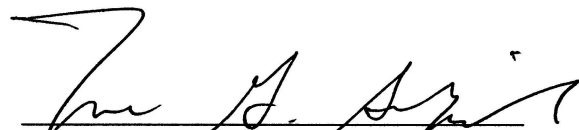
/s/ Daniel Stein

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Cc: Assistant United States Attorney Ni Qian (via ECF)

Application Granted. By **July 10, 2023**, the parties shall file any motions *in limine*, and by **July 17, 2023**, any responses to the motions. By **July 24, 2023**, the parties shall file a joint statement as provided in the Courts Individual Rule I.1., a joint proposed *voir dire*, joint proposed requests to charge, and a joint proposed verdict sheet, in each case noting any disagreements between the parties. The final pretrial conference currently scheduled for May 8, 2023, is adjourned to **July 31, 2023, at 11:00 a.m.** The jury trial previously scheduled for May 15, 2023, is adjourned to **August 9, 2023, at 9:45 a.m.** or the Court's first available date thereafter. The parties shall be ready to proceed on 24 hours notice on or after August 9, 2023. The Clerk of the Court is directed to terminate the letter motion at docket number 27.

Dated: April 18, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE